

September 6, 1995

Mr. Duong Nguyen
Hazardous Waste Management Division H-4-1
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Nguyen:

RE: U.S. EPA WARNING LETTER DATED AUGUST 16, 1995

This is in response to the warning letter dated August 16, 1995. The warning letter summarized the findings of a hazardous waste investigation conducted at Rollins OPC facility located at 5756 Alba Street, Los Angeles, California on June 6, 1995.

Enumerated below are the facility's responses to the comments/issues raised in the warning letter.

Comment 1:

Submit documentation proving that the pot holes in the secondary containment concrete floor near tank # V-2 have been repaired.

Response 1:

During the inspection, the area designated as the waste water treatment system was under construction to modify and modernize the treatment and waste storage capabilities. With this construction activity, new foundations were required to comply with design criteria as specified in our earlier communication of August 31, 1995. A copy of an independent California Registered Engineer certifying the new foundation and area as complete and ready for use was enclosed in our earlier communication. The earlier letter did not, however, describe the repair of the pot holes as referenced in your comment. This response documents that the pot holes were indeed repaired immediately following your visit and the attached photographs adequately depict the repairs of the pot holes beneath the tank # V-2. We regret any confusion this unfortunate omission may have caused.

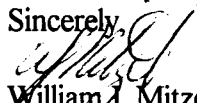
Comment 2:

Submit documentation proving that a signed copy of the outgoing manifest # LAA332912 was returned to Rollins OPC from the designated treatment, storage, and disposal facility (TSDF). Also provide documentation proving that as a standard operating procedure Rollins OPC will contact the TSDF if the manifest copy has not been returned within 35 days of the initial shipment date and file an exception report if a copy has not been returned within 45 days of the initial shipment date.

Response 2:

The earlier letter from Rollins OPC provided a copy of the returned manifest. Rollins OPC has also instituted a procedure to track returned manifest copies from the designated TSDF's. This internal standard operating procedure begins by stamping the returned manifest copy with a "Received" date and adding this date to the Shipping Activity report form with an additional column titled "Generator Return Copy Received." This will be updated on a daily or as necessary basis and will ensure that the staff is aware of the 35 day and 45 day limit for the return of a manifest and can act appropriately as outlined in your comments and the procedure. A copy of the Shipping Activity report and the procedure is attached.

I trust that the information provided in this letter will adequately answer the issues raised in the said warning letter, and return the facility to compliance. If you have any further questions please contact me at (213) 585-5063.

Sincerely,

William J. Mitzel
President

Rollins OPC

SHIPPING ACTIVITY

| Date Shipped | Disposal Facility | State Manifest # | P.O. | Type of Material | Stream Number | Quantity Shipped | Carrier | Mode of Transport | Generator Return Copy Received |
|--------------|-------------------|------------------|------|------------------|---------------|------------------|---------|-------------------|--------------------------------|
| 7-28-95 | APTUS | 95454562 | 2158 | LAB PACK | AP-145896 | 115 POUNDS | MATLACK | V-6709 | 8-25-95 |
| 8-08-95 | APTUS | 95454579 | 2230 | BLEND | AP-151311 | 30, 470 POUNDS | MATLACK | SECS 395328 | 9-05-95 |
| 8-17-95 | APTUS | 95454616 | 2259 | BLEND | AP-151311 | 46, 600 POUNDS | MATLACK | T-6142 | 9-06-95 |
| 8-24-95 | RES(TEXAS) | 00794541 | 2289 | T-OX | HO-24294-33 | 31, 520 POUNDS | KVS | T-420 | 9-06-95 |
| 8-25-95 | RES(TEXAS) | 00794545 | 2293 | T-OX | HO-24294-33 | 38, 190 POUNDS | KVS | T-50 | 9-06-95 |

V=VAN
T=TANKER TRUCK
B=ROLL-OFF BINS

SOP: 0000
DATE: 9/6/95
PAGE: 1
REVISION: 1.0

TITLE: Returned Manifest Copies Procedure

PURPOSE: This Standard Operating Procedure is intended to inform administrative personnel of the proper procedure to document and control returned copies of hazardous waste manifests.

SCOPE: This SOP covers the following procedures: initial receipt of returned copies, documentation of receipt, documentation by reports, 35 day clock, and 45 day clock.

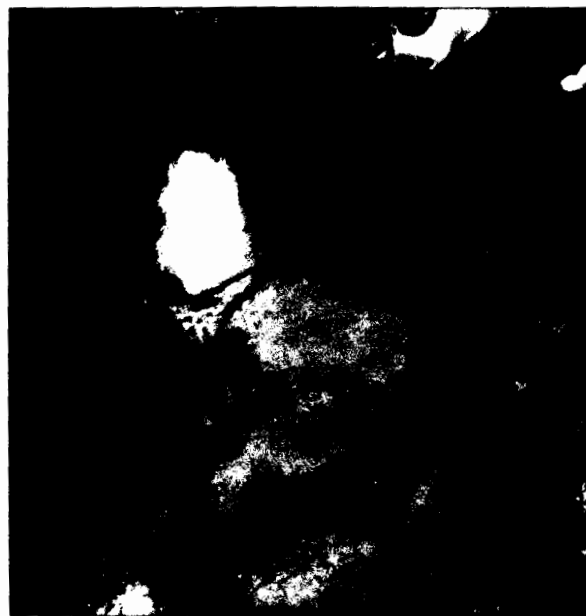
USER: Scheduling/Receiving Manager
Administrative and Clerical Staff
Technical Manager and Technical Staff

PROCEDURES:

1. Upon receipt of returned manifest copies the envelopes shall be opened and the internal manifest copy removed and stamped with the received date.
2. This date of receipt shall be entered upon the Shipping Activity report and the report updated daily or as necessary. This date shall be entered into the column titled "Generator Return Copy Received".
3. Manifest copies not received shall be noted on the report.
4. Manifest copies that have not been received at the 35 day mark shall be highlighted and a call placed to the appropriate TSDF as a reminder of the 35 day clock and appropriate actions taken both with Rollins OPC and/or the TSDF.
5. Manifest copies that have not been received at the 45 day mark shall be highlighted and a call placed to the appropriate TSDF. An exception report shall be forwarded to the appropriate agencies and/or appropriate corrective actions shall be instituted as necessary by Rollins OPC and/or the TSDF.
6. The Scheduling/Receiving Office shall initiate the above actions as appropriate.



V-2 Front View



V-2 Area of Conc. Repair



V-2 Area of Conc. Repair